

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ELIZABETH CHAN, *et al.*,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
TRANSPORTATION, *et al.*,

*Defendants.*

Case No. 1:23-cv-10365 (LJL)

Case No. 1:24-cv-01644 (LJL)

MICHAEL MULGREW, *et al.*,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
TRANSPORTATION, *et al.*,

*Defendants.*

**NOTICE OF CROSS MOTION FOR  
SUMMARY JUDGMENT BY THE  
METROPOLITAN TRANSPORTATION  
AUTHORITY, THE TRIBOROUGH  
BRIDGE AND TUNNEL AUTHORITY,  
THE NEW YORK CITY DEPARTMENT  
OF TRANSPORTATION, AND  
WILLIAM J. CARRY**

PLEASE TAKE NOTICE that, upon (1) the accompanying Memorandum of Law in Support of the Cross-Motion for Summary Judgment and Opposition to Plaintiffs' Motions for Summary Judgment and (2) the Administrative Record, Defendants the Metropolitan Transportation Authority, the Triborough Bridge and Tunnel Authority, the New York City Department of Transportation, and William J. Carry hereby move this Court for an order granting summary judgment pursuant to Federal Rule of Civil Procedure 56.

Dated: December 9, 2024

Respectfully submitted,

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